

## **REMARKS**

Reconsideration of this application, as amended, is respectfully requested.

Claims 1, 3-9 and 11 are pending. Claims 1, 3-9 and 11 have been rejected.

Claims 1, 7, and 9 have been amended. No claims have been canceled. No claims have been added. Support for the amendments is found in the specification, the drawings, and in the claims as originally filed. Applicants submit that the amendments do not add new matter.

Applicants reserve all rights with respect to the applicability of the Doctrine of Equivalents.

Applicants submit herewith a courtesy copy of the Supplemental Amendment with transmittals as filed on July 24, 2007 for the Examiner's reference, as discussed during the interview. A copy of the post card with the stamp indicating that this Supplemental Amendment was received at the US PTO on July 30, 2007, is submitted herewith.

## **INTERVIEW SUMMARY**

The representative for applicants thanks the Examiner for the courtesy of the telephonic interview on October 12, 2007. The applicants' proposed amendments to response to the Office Action mailed on September 21, 2007 were discussed in light of the cited references. The representative for applicants discussed the claimed invention with the Examiner. The Examiner asked the representative for applicants to provide a proposed amendment in light of the discussion. No formal agreement was reached as to any claims.

Claims 1, 3-9 and 11 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,785,704 to McCanne et al. ("McCanne.2") in view of "Host Anycasting Service" to Partridge, et al. ("Partridge").

Applicants reserve the right to swear behind McCanne.2.

Applicants respectfully submit that amended claim 1 is not anticipated under 35 U.S.C. § 102(e) over McCanne.2 in view of Partridge.

Applicants have amended claim 1 to include mapping the URL to a corresponding anycast address for the information object, wherein the information object repository is selected according to specified performance metrics by mapping an address of the client to one or more addresses of the information object repositories using a Web Information Locator by Distance (WILD) protocol that runs on top of a Transmission Control Protocol (TCP).

Applicants respectfully submit that support for such limitation of amended claim 1 is set forth, for example, in paragraph [0066] of the specification.

It is respectfully submitted that neither McCanne.2, Partridge, nor a combination thereof discloses such limitations of amended claim 1.

McCanne.2 discloses a content distribution system for operation over an internetwork including content peering arrangements. More specifically, McCanne.2 discloses that "...Web cache would parse the URL path and determine that it should go to a particular Web server in the network to pull down the content (col. 23, lines 14-19). In particular, McCanne.2 discloses:

Alternatively, existing server technology can be extended with rules for how to resolve the content request via the conventions in the URL. That is, a new URL format could be defined such that web caches could recognize the special format and handle the request according to the new semantics, e.g., on a miss, the cache fetches the content from the server location embedded in the URL. Or, the cache could be extended with protocols that conform to the CDN network and could directly fetch the content across the CDN. Similarly, for live content, a modified streaming-media server could subscribe to a broadcast by joining an application-level multicast group that is either embedded in the URL or retrieved from a directory using meta-information encoded in the URL.  
(McCanne 2, col. 23, lines 52-67) (emphasis added)

In contrast, amended claim 1 refers to mapping the URL to a corresponding anycast address for the information object, wherein the information object repository is selected according to specified performance metrics by mapping an address of the client to one or more

addresses of the information object repositories using a Web Information Locator by Distance (WILD) protocol that runs on top of a Transmission Control Protocol (TCP).

Partridge, in contrast, discloses host anycasting service. More specifically, Partridge discloses sending a query to an anycast address (page 2, paragraph 1 and page 3 paragraph 2).

Furthermore, even if McCanne.2 and host anycasting service of Partridge were combined with the content distribution system of McCanne.2, such a combination would still lack mapping the URL to a corresponding anycast address for the information object, wherein the information object repository is selected according to specified performance metrics by mapping an address of the client to one or more addresses of the information object repositories using a Web Information Locator by Distance (WILD) protocol that runs on top of a Transmission Control Protocol (TCP), as recited in amended claim 1.

Given that amended claims 7 and 9 contain discussed limitations, applicants respectfully submit that amended claims 7 and 9 are not anticipated under 35 U.S.C. § 102(e) over McCanne.2 in view of Partridge.

Because claims 3-6, 8, and 11 depend from amended claims 1, 7, and 9 respectively, applicants respectfully submit that amended claims 3-6, 8, and 11 are not anticipated under 35 U.S.C. § 102(e) over McCanne.2 in view of Partridge.

Claims 1, 3-9 and 11 have been rejected under 35 U.S.C. § 102(e) as being anticipated by McCanne.2 in view of “Application-Layer Anycasting” to Bhattacharjee (“Bhattacharjee”). Applicants reserve the right to swear behind McCanne.2.

Applicants respectfully submit that amended claim 1 is not anticipated under 35 U.S.C. § 102(e) over McCanne.2 in view of Bhattacharjee.

It is respectfully submitted that neither McCanne.2, Bhattacharjee, nor a combination thereof discloses mapping the URL to a corresponding anycast address for the information object, wherein the information object repository is selected according to specified performance

metrics by mapping an address of the client to one or more addresses of the information object repositories using a Web Information Locator by Distance (WILD) protocol that runs on top of a Transmission Control Protocol (TCP), as recited in amended claim 1.

As set forth above, McCanne.2 discloses a content distribution system for operation over an internetwork including content peering arrangements, and fails to disclose mapping the URL to a corresponding anycast address for the information object, wherein the information object repository is selected according to specified performance metrics by mapping an address of the client to one or more addresses of the information object repositories using a Web Information Locator by Distance (WILD) protocol that runs on top of a Transmission Control Protocol (TCP), as recited in amended claim 1.

Bhattacharjee, in contrast, discloses application-layer anycasting.

Furthermore, even if the application- layer anycasting of Bhattacharjee were incorporated into the content distribution system of McCanne.2, such a combination would still lack mapping the URL to a corresponding anycast address for the information object, wherein the information object repository is selected according to specified performance metrics by mapping an address of the client to one or more addresses of the information object repositories using a Web Information Locator by Distance (WILD) protocol that runs on top of a Transmission Control Protocol (TCP), as recited in amended claim 1.

Given that amended claims 7 and 9 contain discussed limitations, applicants respectfully submit that amended claims 7 and 9 are not anticipated under 35 U.S.C. § 102(e) over McCanne.2 in view of Bhattacharjee.

Because claims 3-6, 8, and 11 depend from amended claims 1, 7, and 9 respectively, applicants respectfully submit that amended claims 3-6, 8, and 11 are not anticipated under 35 U.S.C. § 102(e) over McCanne.2 in view of Bhattacharjee.

Claims 1, 3-9, and 11-14 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,415,323 to McCanne (“McCanne”) in view of McCanne.2, further in view of Bhattacharjee.

Applicants reserve the right to swear behind McCanne and McCanne.2.

Applicants respectfully submit that amended claim 1 is patentable under 35 U.S.C. § 103(a) over McCanne in view of McCanne.2, and further in view of Bhattacharjee.

It is respectfully submitted that neither of the references cited by the Examiner teaches or suggests a combination with each other. It would be impermissible hindsight, based on applicants’ own disclosure, to combine McCanne, McCanne.2, and Bhattacharjee.

Furthermore, even if the application-layer anycasting of Bhattacharjee and a content distribution system of McCanne.2 were incorporated into the redirection system of McCanne, such a combination would still lack mapping the URL to a corresponding anycast address for the information object, wherein the information object repository is selected according to specified performance metrics by mapping an address of the client to one or more addresses of the information object repositories using a Web Information Locator by Distance (WILD) protocol that runs on top of a Transmission Control Protocol (TCP), as recited in amended claim 1.

McCanne discloses a proximity-based redirection system. More specifically, McCanne discloses:

A user initiates a content request, e.g., by clicking on a Web link represented as a URL.

The client resolves the DNS name of the resource that the URL references. This name ultimately resolves to an anycast address that was administered by the authority (e.g., www.acme.com is a CNAME for any-10-1-18.27.cbb.net). (McCanne, col. 15, lines 59-65)(emphasis added)

In contrast, amended claim 1 refers to mapping the URL to a corresponding anycast address for the information object, wherein the information object repository is selected according to specified performance metrics by mapping an address of the client to one or more

addresses of the information object repositories using a Web Information Locator by Distance (WILD) protocol that runs on top of a Transmission Control Protocol (TCP).

As set forth above, McCanne.2 discloses, in contrast, a content distribution system for operation over an internetwork including content peering arrangements.

As set forth above, Bhattacharjee, in contrast, discloses application-layer anycasting.

Given that amended claims 7 and 9 contain discussed limitations, applicants respectfully submit that amended claims 7 and 9 are not obvious under 35 U.S.C. § 103(a) over McCanne, in view of McCanne.2, and further in view of Bhattacharjee.

Because claims 3-6, 8, and 11-14 depend from amended claims 1, 7, and 9 respectively, applicants respectfully submit that amended claims 3-6, 8, and 11-14 are not obvious under 35 U.S.C. § 103(a) over McCanne, in view of McCanne.2, and further in view of Bhattacharjee.

It is respectfully submitted that in view of the amendments and arguments set forth herein, the applicable rejections and objections have been overcome. If the Examiner believes a further telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Tatiana Rossin at (408) 720-8300.

If there are any additional charges, please charge Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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By:   
Tatiana Rossin  
Reg. No. 56,833

1279 Oakmead Parkway  
Sunnyvale, California 94085-4040  
(408) 720-8300  
Fax No. (408) 720-8383